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Remarks/arguments:

In response to the office action of March 18, 2005, the text of the application has been amended to more clearly set forth antecedent basis for the terms used in the claims.

The examiner's comments concerning the drawings have been considered. As a result, claims 13 and 14 have been cancelled as terms used in these claims do not have clear support in the drawings. However, many of the terms objected to by the examiner are shown in the text. For example, a plurality of modules are illustrated. Other items may not be illustrated, such as "the transmission to the base station", but clearly the means by which such a transmission is made is illustrated, see FIG. 6, line 50, 64.

The examiner has objected to the specification and to the title. It is believed that the amendments to the description should overcome the examiner's objections. With regard to the TITLE, it is believed to be descriptive. However, if the examiner would prefer another, applicant would be willing to receive suitable suggestions.

The examiner has rejected claims 1-4 as unpatentable over Mann in view of Fiebig. In the rejection the examiner acknowledges that Mann does not disclose a plurality of modules and a data bus between at least two modules via which data, in particular control data for the hand held device is transferable. The examiner takes the position with respect to the limitation of a plurality of modules, that mere duplication of parts has no patentable significance. However, claim 1 does not merely claim a plurality of modules, but differing identified modules, i.e., "a hand-held module (10), and at least one or more additional modules including a base station module (30), a connection module (24), a service module (62), and a storage battery module (22) which may be secured to the hand-held module (10)". This is not a mere duplication of parts.

The examiner attempts to overcome the defects of Mann by Fiebig who merely discloses a battery charging station. Thus Fiebig states: "According to the invention the charging device for charging a plurality of rechargeable batteries includes a plurality of battery chambers, each of which can hold a rechargeable battery, at least two sensors associated with each rechargeable battery, each of the at least two sensor devices including

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means for measuring a measurable parameter of its associated rechargeable battery, switchable means for electrically connecting at least one rechargeable battery at a time for charging and control means for selecting rechargeable batteries for charging in an order determined by measured values of the measurable parameters obtained from the at least two sensors associated with each rechargeable battery. The control means includes means for weighting [sic] the measured parameters of each rechargeable battery according to a priority factor to obtain weighted combined values, means for comparing the weighted combined values of the measured parameters to at least one predetermined limiting value to determine the order in which the rechargeable batteries are charged and means for controlling the switchable means to connect the rechargeable batteries for charging according to that order." While this patent is of interest, it does not disclose a plurality of modules including at least a hand-held module, and at least one or more additional modules including a base station module, a connection module, a service module, and a storage battery module which may be secured to the hand-held module. Nor does he disclose a data bus provided between at least two modules via which data, in particular control data for the hand-held module, is transferable. He has no hand-held module. While there is a data transfer between batteries and the charging unit, this patent is remote from what is being claimed. Even if it could be combined with Mann in the manner suggested by the examiner, the combination would still not teach the subject matter now being claimed. Accordingly, the examiner is respectfully requested to withdraw this grounds of rejection of claim 1 and defendant claims 2-4.

The examiner next rejects claims 5, 6, 8, 11, 16 and 17 as unpatentable over Mann in view of Fiebig and Sainbury et al. Initially it should be noted that Sainbury et al does not cure the defects of Mann and Fiebig as applied to claim 1, and therefore the claims should be allowable for this reason alone. In addition, there would be no reason to modify Mann by Sainbury et al absent applicant's disclosure. Furthermore, Sainbury et al does not disclose with respect to claim 8 "an outer configuration which extends flush with a surface of the hand-held module (10), the separation line (26) between the hand-held module (10) and the other modules extends not in a linear manner but in a wavy manner to contribute to the aesthetically pleasing appearance of the device and makes possible an improved anchoring

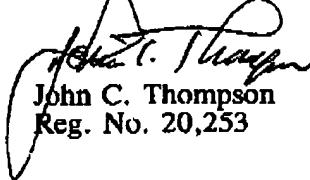
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with relatively little construction effort." The Sainbury et al modules do not form a portion of the handgrip as required in claims 11. For these additional reasons the examiner is respectfully requested to withdraw the rejection of claims 5, 6, 8, 10, 11, 16, and 17.

The examiner next rejects claims 7, 9, 12-16, and 18-20 over the Wagner reference in combination with the previously cited references. Initially, it should be noted that claims 9, 12, 13, and 18 have been cancelled. The Wagner reference relates to hand tools used in space by astronauts to change instruments on spacecraft such as the Hubble Space Telescope. Control of the tool is embodied in software embedded on a processor within the tool which may also communicate with remote software. While this device is interesting, it has little bearing on the subject matter of claim 1. It is respectfully submitted that one skilled in the design of light polymerization devices would not look to tools used in outer space for his design features, and that therefore this device comes from a non-analogous prior art. Furthermore, there is nothing in Wagner which overcomes the basis deficiencies of Mann and Fiebig. Accordingly, the examiner is respectfully requested to withdraw this grounds of rejection.

In that all claims are deemed to be formal, and in that all claims remaining in this application are deemed to be allowable over the prior art cited and applied by the examiner, the allowance of this application is respectfully requested.

Respectfully submitted,



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